

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

**BLAKE BEELER, et al.,**

**Plaintiffs,**

**v.**

**JEFF LONG,**

**Defendant.**

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**No. 3:21-cv-152**

**Judge Katherine A. Crytzer**

**Magistrate Judge Debra C. Poplin**

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**SUPPLEMENTAL DECLARATION IN SUPPORT OF  
UNOPPOSED MOTION FOR ATTORNEY'S FEES**

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I, Raymond M. DiGuiseppe, have personal, firsthand knowledge of the matters set forth below and, if called as a witness, I could and would testify competently thereto in further support of the pending Unopposed Motion for Attorney's Fees (D.E. 52 & D.E. 52-1) ("Motion"):

1. The figure of \$47,250 referenced in the Motion was based on a total of 125 hours of time accrued up through the point at which the parties submitted their initial proposed Agreed Order back on January 23, 2023 (and thus, as noted in the initial Declaration, D.E. 52-1, this figure does not include the substantial additional time plaintiffs have invested into the case since then).

2. Specifically, this figure includes the time related to the following tasks up through January 23: investigating the relevant facts, researching the relevant law, and preparing the initial complaint based on the relevant law and facts; defending against defendants' motion to dismiss the complaint; handling the initial discovery process under Rule 26; conferencing with defense counsel regarding the same; attending hearings before the Court; reviewing orders of the Court; preparing the amended complaint after *Bruen* issued; engaging in extensive settlement discussions

and negotiations with defense counsel; and preparing, editing, and conferencing with defense counsel and our clients about the terms and conditions of the initially proposed Agreed Order.

3. Again, the time claimed in this Motion has been followed by many more unclaimed hours involving negotiations and discussions with defense counsel and our clients, as well as the drafting and editing of the settlement agreement and subsequent Agreed Order that was approved.

4. The hourly rate applied to the calculated time of 125 hours is \$375 per hour, which the parties have agreed is reasonable under lodestar standards, as stated in the initial Declaration. This equates to \$46,875. The complaint filing fee was \$402. Thus, the grand total of the claimed fees and costs is \$47,277. For simplicity, we have rounded it down to \$47,250.

5. For these reasons and those stated in the initial Declaration, the plaintiffs respectfully request that the Court grant this unopposed motion for attorney's fees and costs.

Dated: April 10, 2023

Respectfully Submitted,

s/ Raymond M. DiGuiseppe

Raymond M. DiGuiseppe (Pro Hac Vice)

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed electronically and served through the electronic filing system on this the 10th day of April 2023, upon the following:

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s/ Raymond M. DiGuiseppe  
Raymond M. DiGuiseppe